

EXHIBIT 3

-----Original Message-----
18-23588-SHL Doc 8315-3 Filed 07/20/20 Entered 07/20/20 12:00:17 Exhibit 3
From: "Hwang, Angeline" <Angeline.Hwang@weil.com> Pg 2 of 54
Sent: Wednesday, March 25, 2020 2:19pm
To: "russell@russelljohnsonlawfirm.com" <russell@russelljohnsonlawfirm.com>
Cc: "John Craig" <john@russelljohnsonlawfirm.com>, "Fail, Garrett" <Garrett.Fail@weil.com>, "DiDonato, Phil" <Philip.DiDonato@weil.com>, "Eacevedo@miiipartners.com" <Eacevedo@miiipartners.com>
Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Thanks, Russ, as provided in paragraph 4 of the attached order, the Debtors will hold that amount until the issue is resolved. Please send us a copy of the notice of withdrawal once filed.

Best,

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com>
+1 212 310 8258 Direct
+1 212 310 8007 Fax

From: russell@russelljohnsonlawfirm.com <russell@russelljohnsonlawfirm.com>
Sent: Wednesday, March 25, 2020 2:12 PM
To: Hwang, Angeline <Angeline.Hwang@weil.com>
Cc: John Craig <john@russelljohnsonlawfirm.com>; Fail, Garrett <Garrett.Fail@weil.com>; DiDonato, Phil <Philip.DiDonato@weil.com>; Eacevedo@miiipartners.com
Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

As long as that \$106,000 remains in the Adequate Assurance Account for PSE&G until we resolve the issues with the landlord and Transform, I have authority to withdraw the Motion.

-----Original Message-----

From: "Hwang, Angeline" <Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com>>
Sent: Monday, March 23, 2020 3:45pm
To: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Cc: "John Craig" <john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com>>, "Fail, Garrett"
<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com>>, "DiDonato, Phil"
<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com>>,
"Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com>"
<Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com>>
Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Russ,

I hope you're doing well in these difficult times. I just wanted to follow up on the below, were you able to connect with your client?

Best,

Angeline Hwang

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com>
+1 212 310 8258 Direct
+1 212 310 8007 Fax

-----Original Message-----

From: russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Sent: Friday, March 13, 2020 3:52 PM
To: Hwang, Angeline <Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com>>
Cc: John Craig <john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com>>; Fail, Garrett
<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com>>; DiDonato, Phil
<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com>>;
Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com>
Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

That is fine. My client contact still has not answered my communications.

-----Original Message-----

From: "Hwang, Angeline" <Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com>>
Sent: Friday, March 13, 2020 2:48pm
To: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Cc: "John Craig" <john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com>>, "Fail, Garrett"
<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com>>, "DiDonato, Phil"
<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com>>,
"Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com>"
<Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com>>
Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Russ – Chambers has requested an advance copy of the agenda. Given our call earlier this week, I will have your motion under the “Adjourned” section until you confirm that it will be withdrawn.

Best,

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

From: Hwang, Angeline

Sent: Wednesday, March 11, 2020 3:18 PM

To: 'russell@russelljohnsonlawfirm.com'

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>

Cc: 'John Craig' <john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com>>; DiDonato, Phil

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com>>;

Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Russ, following up on the below. Please let me know if you were able to touch base with PSE&G.

Best,

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

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From: Hwang, Angeline

Sent: Thursday, March 5, 2020 2:28 PM

To: 'russell@russelljohnsonlawfirm.com'

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett
<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>; DiDonato, Phil
<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>;
Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

If the only outstanding issue with PSE&G is that dispute regarding the \$106K between Transform and a landlord, I believe since we agreed to keep it in the Adequate Assurance Account, it's already provided for and therefore the motion is not necessary. If there are other issues, please let me know.

Happy to discuss.

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

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New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

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russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Sent: Wednesday, March 4, 2020 1:01 PM

To: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>; DiDonato, Phil

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>;

Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

PSE&G is the only client I have left on this and my contact was out the last 2 weeks. I am trying to set up a meeting with her to discuss.

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Sent: Tuesday, March 3, 2020 9:39am

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>, "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>

Cc: "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>, "DiDonato, Phil"

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>, "Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com><mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com%3e>"

<Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408 Russ, following up on my email below, please let me know if you are amenable to withdrawing the motion. I believe we have a good process set up now to address any issues that may come up, so we believe the motion is no longer necessary.

Happy to discuss.

Best,

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

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From: Hwang, Angeline

Sent: Wednesday, February 26, 2020 2:28 PM

To: 'russell@russelljohnsonlawfirm.com'

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>; John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>

Cc: Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>; DiDonato, Phil

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>;

Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Russ – I saw that you filed a notice of withdrawal of National Grid's application, I assume that means the check was received.

I believe that leaves just the motion (ECF No. 1395). Are you amenable to withdrawing the motion? To the extent any issues arise, we can address them as we have been addressing them, and it will cut down the administrative hassle on both of our parts, I believe.

Please let me know if you want to discuss.

Best,

[Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

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From:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Sent: Friday, February 21, 2020 4:19 PM

To: DiDonato, Phil

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>

Cc: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>; John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>; 'Slome, Thomas'

<tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com%3cmai

lto:tslome@cullenanddykman.com>>>; 'Kwiatkowski, Michael'

<mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com%3cmailto:mkwiatkowski@cullenanddykman.com>>>;

Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Account No. [REDACTED] 18-02

-----Original Message-----

From: "DiDonato, Phil"

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>

Sent: Friday, February 21, 2020 4:02pm

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>, "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>, "Slope, Thomas"

<tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com%3cmailto:tslome@cullenanddykman.com>>>, "Kwiatkowski, Michael"

<mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com%3cmailto:mkwiatkowski@cullenanddykman.com>>>,

"Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com><mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com%3e>"

<Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408 Russ,

We are proposing including the below language in the revised order to be submitted to Chambers. Can you please fill in the highlighted account number for PSE&G? We are hoping to file a CNO with a revised proposed order today.

"Notwithstanding anything herein, the Debtors shall hold, subject to the provisions of the Utilities Order at ECF No. 431, \$106,303.00 on behalf of PSE&G on account of account number [FILL IN]."

Thank you,
Phil

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Philip DiDonato

Weil, Gotshal & Manges LLP
767 Fifth Avenue

New York, NY 10153

Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>

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+1 212 310 8007 Fax

From:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Sent: Monday, February 17, 2020 4:33 PM

To: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>; DiDonato, Phil

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>; 'Slome, Thomas'

<tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com%3cmailto:tslome@cullenanddykman.com>>>; 'Kwiatkowski, Michael'

<mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com%3cmailto:mkwiatkowski@cullenanddykman.com>>>;

Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Thank you.

\$106,303.

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Sent: Monday, February 17, 2020 4:22pm

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>, "DiDonato, Phil"

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>, "'Slome, Thomas'"

<tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com%3cmailto:tslome@cullenanddykman.com>>>, "Kwiatkowski, Michael"
 <mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com%3cmailto:mkwiatkowski@cullenanddykman.com>>>, "Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com><mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>>>
 <Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com<mailto:Eacevedo@miiipartners.com%3cmailto:Eacevedo@miiipartners.com>>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408 Thanks, Russ, we will reflect the adjournment/withdrawal on the agenda. Can you please confirm the exact amount of the PSEG account for the order?

And I will follow up regarding the check for National Grid.

Best,

[Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

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From:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>>

Sent: Monday, February 17, 2020 4:02 PM

To: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>>; DiDonato, Phil

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>>; Russell Johnson

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>>; 'Slome, Thomas'

<tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com<mailto:tslome@cullenanddykman.com%3cmailto:tslome@cullenanddykman.com>>>>; 'Kwiatkowski, Michael'

<mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com<mailto:mkwiatkowski@cullenanddykman.com%3cmailto:mkwiatkowski@cullenanddykman.com>>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

Yes, that works for PSE&G.

We will be filing the Notice of Withdrawal for Docket No. 3423 (Com Ed Application).

For the National Grid Application (Docket No. 3238), once we confirm receipt of the settlement check, we will file a Notice of Withdrawal of that Application.

As to Docket No. 1395, my clients agree to adjourn that to the March 25, 2020 date on the same terms as prior adjournments.

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Sent: Monday, February 17, 2020 9:55am

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>, "DiDonato, Phil"

<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmailto:Philip.DiDonato@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408 Russ – further from our discussion last week, please see below for the amounts being held for PSEG.

[cid:image002.png@01D5F946.665C9C70]

My understanding is that the PSEG account in question is already closed, and the only issue is the 106K that is currently in dispute between Transform and the landlord. Although we believe that the Debtors are not obligated to pay such amount, we will agree to carve out that amount from the order approving the pending utilities motion. Please let us know if that works for you.

Looking forward to hearing back from you regarding the adjournments.

Best,

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

From: Hwang, Angeline
Sent: Friday, February 14, 2020 4:38 PM
To: 'russell@russelljohnsonlawfirm.com'
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>
Cc: John Craig
<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>>; Fail, Garrett
<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>>; DiDonato, Phil
<Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com<mailto:Philip.DiDonato@weil.com%3cmmailto:Philip.DiDonato@weil.com>>>>
Subject: RE: Sears | Utilities Motion/Application | Adjournment | FRE 408

We can agree to carve out the PSEG amount, would that work? And the next omnibus hearing is March 25th.

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>
+1 212 310 8258 Direct
+1 212 310 8007 Fax

From:
russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>
Sent: Friday, February 14, 2020 3:26 PM
To: Hwang, Angeline
<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>>
Cc: John Craig
<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>>; Fail, Garrett
<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>>
Subject: RE: Sears | Utilities Motion/Application | Adjournment

With respect to prior terms, what will the amount in the Adequate Assurance Account for PSEG be if the Debtors are able to remove the \$35,465.51 that they are seeking to remove?

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Sent: Friday, February 14, 2020 1:40pm

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment Russ,

In anticipation of the Debtors' response deadline next Tuesday, can you please let us know if you agree to adjourn ECF No. 1395, 3238, and 3423 on the same terms as prior adjournments?

Further, please let us know once you receive the check for National Grid.

Thanks,

[Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

From:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Sent: Tuesday, January 21, 2020 2:52 PM

To: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>; Russell Johnson

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment

They can be adjourned on the same terms as prior adjournments.

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

Sent: Tuesday, January 21, 2020 11:14am

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment Russ – following up, please let me know if you have heard back from your clients.

[Description: Description: Description: Description: Description: 100902WeilWebSmall]

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

From: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

Sent: Monday, January 20, 2020 9:30 PM

To:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: Re: Sears | Utilities Motion/Application | Adjournment

February 24th.

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue<x-apple-data-detectors://0/0>

New York, NY 10153<x-apple-data-detectors://0/0>

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

+1 212 310 8258<tel:+1%20212%20310%208258> Direct

+1 212 310 8007<tel:+1%20212%20310%208007> Fax

On Jan 20, 2020, at 9:08 PM,

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>> wrote:

None of my clients were in today. I should have an answer tomorrow morning. What is the February adjourned date?

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Sent: Monday, January 20, 2020 8:42pm

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment Russ – following up on the adjournments of ECF Nos. 1395, 3238, and 3423, please let me know if your clients agree to adjourn to the February omnibus hearing. Given the number of items slated to go forward on 1/28, Chambers has requested early notice of adjournments so they can prepare for the matters that are actually going forward.

Thanks,

<image001.jpg>

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

From: Hwang, Angeline

Sent: Friday, January 17, 2020 3:54 PM

To: 'russell@russelljohnsonlawfirm.com'

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment

To the extent the accounts relate to properties that have been transferred to Transform, the adequate assurance deposits for such accounts belong to Transform. To the extent the accounts relate to properties that were rejected during these cases or relate to properties still owned by the Debtors, the adequate assurance deposits for such accounts belong to the Debtors.

<image001.jpg>

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

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+1 212 310 8007 Fax

From:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Sent: Friday, January 17, 2020 3:48 PM

To: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment

Of the \$5.3 million in utility deposits that the Court held belonged to Transform, which appear to be part of the settlement motion with Transform, does any of that pertain to the accounts of my remaining clients?

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Sent: Friday, January 17, 2020 10:03am

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment Russ, John,

Chambers has requested an advance copy of the agenda and inquired as to what matters we believe will actually go forward at the 1/28 hearing. Can you please let us know if you are willing to adjourn the applications (ECF Nos. 3238, 3423, 3459, and 3480) to the February omnibus hearing under the same conditions as we have previously adjourned? Also, regarding the motion (ECF No. 1395), I don't believe withdrawing it will prejudice your clients in anyway given that we are continuing to work with you and Transform to close out or transfer accounts out of the Debtors' name. Happy to discuss but we would appreciate it if you would agree to withdraw the motion.

Best,

<image001.jpg>

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

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<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmailto:russell@russelljohnsonlawfirm.com>>>

Sent: Thursday, December 5, 2019 1:14 PM

To: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmailto:Angeline.Hwang@weil.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment

We can adjourn to the January 2020 date so long as amounts remain in the adequate assurance account for those utilities that still have active accounts. If you need to know which utilities those are, I can prepare a list.

For example, Baltimore Gas & Electric informed me that 10 accounts were just recently closed, but they still have 5 in the Debtors' names.

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

Sent: Thursday, December 5, 2019 10:07am

To:

"russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.commailto:john@russelljohnsonlawfirm.commailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.commailto:Garrett.Fail@weil.commailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment Russ – are you still waiting to hear from some clients?

<image001.jpg>

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

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+1 212 310 8007 Fax

From:

russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

<russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>

Sent: Wednesday, December 4, 2019 10:38 AM

To: Hwang, Angeline

<Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>>

Cc: John Craig

<john@russelljohnsonlawfirm.commailto:john@russelljohnsonlawfirm.commailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>>; Fail, Garrett

<Garrett.Fail@weil.commailto:Garrett.Fail@weil.commailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment

From the responses I have received, it appears that the adjournment will not be a problem, but I am still waiting to hear from a few clients.

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

Sent: Wednesday, December 4, 2019 10:01am

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com%3e>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>, "Fail, Garrett"

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment Russ – following up on the adjournments. Apologies for the repeated emails but Chambers is reaching out almost every day regarding adjournments so they can prepare for the hearing.

Best,

<image001.jpg>

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

From: Hwang, Angeline

Sent: Tuesday, December 3, 2019 8:34 PM

To: 'russell@russelljohnsonlawfirm.com'

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment

Yes, to the extent that the accounts are still active and still in the Debtors' name. And yes, the next omnibus hearing is 1/28/2020, it was noticed today.

Will you agree to adjourn the motion and the applications to the January omnibus hearing?

<image001.jpg>

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

From:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>

Sent: Tuesday, December 3, 2019 8:31 PM

To: Hwang, Angeline

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>>

Cc: John Craig

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>>; Fail, Garrett

<Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com<mailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment

Is the adjournment on the same condition as all prior adjournments that the amounts in the adequate assurance account remain for the utilities that still have active accounts until the next hearing date?

Also, when is the next hearing date? Is it 1/28/20?

-----Original Message-----

From: "Hwang, Angeline"

<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>>

Sent: Tuesday, December 3, 2019 1:22pm

To:

"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>

Cc: "John Craig"

<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>>, "Fail, Garrett"

<Garrett.Fail@weil.commailto:Garrett.Fail@weil.commailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities Motion/Application | Adjournment Russ - following up on the below. Chambers has requested that they be informed of adjournments earlier, so if you could let us know in the next day or so, we would greatly appreciate it.

Happy to discuss.

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

+1 212 310 8258 Direct

+1 212 310 8007 Fax

-----Original Message-----

From: Hwang, Angeline

Sent: Monday, December 2, 2019 5:57 PM

To: 'russell@russelljohnsonlawfirm.com'

<russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.commailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>

Cc: John Craig

<john@russelljohnsonlawfirm.commailto:john@russelljohnsonlawfirm.commailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>; Fail, Garrett

<Garrett.Fail@weil.commailto:Garrett.Fail@weil.commailto:Garrett.Fail@weil.com%3cmmailto:Garrett.Fail@weil.com>>>

Subject: RE: Sears | Utilities

Russ,

We are continuing to work with Transform and Engie to ensure that all active accounts are being dealt with appropriately. Please let us know if you are amenable to further adjourning the applications (ECF Nos. 3238, 3423, 3459, and 3480) to the January omnibus hearing. Further, given that the motion (ECF No. 1395) is moot at this point, will you agree to withdraw the motion, or in the alternative, adjourn indefinitely?

Happy to discuss.

Best,

Angeline Hwang

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.commailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>

+1 212 310 8258 Direct
+1 212 310 8007 Fax

-----Original Message-----

From:
russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>
Sent: Friday, November 15, 2019 7:20 PM
To: Lewitt, Alex
<Alexander.Lewitt@weil.com<mailto:Alexander.Lewitt@weil.com<mailto:Alexander.Lewitt@weil.com%3cmmailto:Alexander.Lewitt@weil.com>>>>
Cc: Hwang, Angeline
<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>>; Russell Johnson
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>; John Craig
<john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com<mailto:john@russelljohnsonlawfirm.com%3cmmailto:john@russelljohnsonlawfirm.com>>>>
Subject: RE: Sears | Utilities

Thank you. All went well. I have authority to adjourn to the 12/13/19 date on the condition that the Adequate Assurance Account amounts will remain open for those utilities of mine that still have active accounts. That list has decreased. I will put a revised summary together next week to let you know which clients still have active accounts and balances.

Thank you for your assistance.

-----Original Message-----

From: "Lewitt, Alex"
<Alexander.Lewitt@weil.com<mailto:Alexander.Lewitt@weil.com<mailto:Alexander.Lewitt@weil.com%3cmmailto:Alexander.Lewitt@weil.com>>>>
Sent: Friday, November 15, 2019 3:52pm
To:
"russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com%3e>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>>
Cc: "Hwang, Angeline"
<Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com<mailto:Angeline.Hwang@weil.com%3cmmailto:Angeline.Hwang@weil.com>>>>
Subject: Sears | Utilities

Russ,

I hope everything went well with your wife's surgery. Please let us know if you'll be able to send us an email today adjourning the utility motions.

Best regards,

[Description: Description: Description: Description: Description: 100902WeilWebSmall] Alexander Lewitt Associate

Weil, Gotshal & Manges LLP

767 Fifth Avenue

New York, NY 10153

Alexander.Lewitt@weil.com<mailto:Alexander.Lewitt@weil.com<mailto:Alexander.Lewitt@weil.com%3cmailto:Alexander.Lewitt@weil.com>>

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+1 917 703 0763 Mobile

+1 212 310 8007 Fax

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, and destroy the original message. Thank you.

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, and destroy the original message. Thank you.

<image001.jpg>

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, and destroy the original message. Thank you.

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, and destroy the original message. Thank you.

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, and destroy the original message. Thank you.

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-----Original Message-----
18-23538-shl Doc 8315-3 Filed 07/20/20 Entered 07/20/20 12:00:17 Exhibit 3
From: "R. Zachary Gelber" <zgelber@gelbersantillo.com> [mailto:zgelber@gelbersantillo.com]>
Sent: Tuesday, April 21, 2020 1:15pm

To: "russell@russelljohnsonlawfirm.com" <mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>

Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook) Russ, I
apologize with how slow this has been. Obviously, the Covid crisis is slowing things down. I will raise this up the chain to
try to get things moving.

--

Best,
Zach

Gelber & Santillo PLLC
347 West 36th Street, Suite 805
New York, NY 10018
Tel: 212-227-4743
Fax: 212-227-7371

Email: zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>

Web: [https://urldefense.proofpoint.com/v2/url?u=http-](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.gelbersantillo.com&d=DwlFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=bAW5fw3JURoql08q_0GPxZ_X3u8fG1rw7CxUUZWA_vA&m=OyyhDeChBEs6l1pjnz-)

[3A__www.gelbersantillo.com&d=DwlFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=bAW5fw3JURoql08q_0GPxZ_X3u8fG1rw7](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.gelbersantillo.com&d=DwlFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=bAW5fw3JURoql08q_0GPxZ_X3u8fG1rw7CxUUZWA_vA&m=OyyhDeChBEs6l1pjnz-)
[CxUUZWA_vA&m=OyyhDeChBEs6l1pjnz-](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.gelbersantillo.com&d=DwlFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=bAW5fw3JURoql08q_0GPxZ_X3u8fG1rw7CxUUZWA_vA&m=OyyhDeChBEs6l1pjnz-)

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<https://urldefense.proofpoint.com/v2/url?u=http-
3A__www.gelbersantillo.com&d=DwMFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=vyiqXNbZE6rabCN6TCCPWtAY7Kxkgt
fvizr2LGLM&m=aA4YI38V-gplcmxkUsv0yAYHY14VGY2V17dcDvhWito&s=JmadiXJVC-
OR0yKcR2pVk7MjZqNYTavE0kyvdJjuULI&e=>

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On Thu, Apr 16, 2020 at 3:42 PM russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>> wrote:
Understood, but fairly soon this will be the subject of a Motion in the Bankruptcy Court or a state court collection action against Transform/landlord.

-----Original Message-----

From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>
Sent: Thursday, April 16, 2020 3:30pm
To: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook) Sorry for the delay Russ. I fear the quarantine has significantly slowed the process of obtaining any documents. I will follow up again and let you know asap.

--

Best,
Zach

Gelber & Santillo PLLC
347 West 36th Street, Suite 805
New York, NY 10018
Tel: 212-227-4743
Fax: 212-227-7371
Email: zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>
Web: https://urldefense.proofpoint.com/v2/url?u=http-
3A__www.gelbersantillo.com&d=DwIFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=bAW5fw3JUroql08q_OGPxZ_X3u8fG1rw7
CxUUZWA_vA&m=OyyhDeChBEs6l1pjnz-
sUutBvFeg6h4aSKlv3Hcb5HM&s=XUmNqF7xGGgvYddWAI9_Qm1_CKwO8aFk99RmxLQ7a80&e=
<https://urldefense.proofpoint.com/v2/url?u=http-
3A__www.gelbersantillo.com&d=DwMFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=vyiqXNbZE6rabCN6TCCPWtAY7Kxkgt
fvizr2LGLM&m=aA4YI38V-gplcmxkUsv0yAYHY14VGY2V17dcDvhWito&s=JmadiXJVC-
OR0yKcR2pVk7MjZqNYTavE0kyvdJjuULI&e=>

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On Thu, Apr 16, 2020 at 3:24 PM russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>> wrote:
Following up on the follow up.

-----Original Message-----

From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>
Sent: Tuesday, March 17, 2020 7:56pm
To: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook) Thanks Russ.
Still waiting on docs. Will follow you with my client.
Best,
Zach

On Tue, Mar 17, 2020 at 4:40 PM russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>> wrote:
The 3/25 hearing was adjourned. When do you expect your letter to landlord's counsel to go out?

-----Original Message-----

From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>
Sent: Wednesday, March 4, 2020 9:47pm
To: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook) Let's speak
tomorrow and I'll update you.

On Wed, Mar 4, 2020 at 1:02 PM russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>> wrote:
Following up to see where you are with the landlord.

-----Original Message-----

From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>
Sent: Monday, February 17, 2020 5:24pm
To: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook) Thanks Russ.

On Mon, Feb 17, 2020 at 4:04 PM russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>> wrote:
Adjourned to March 25, 2020.

-----Original Message-----

From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>
Sent: Thursday, February 13, 2020 6:49pm
To: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook) Ok, thanks
Russell.

--

Best,

Zach

Gelber & Santillo PLLC

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Fax:212-227-7371
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On Thu, Feb 13, 2020 at 6:48 PM russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfirm.com>>
<russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfirm.com>>> wrote:
Waiting to get confirmation that the Debtors are going to maintain the amount in the adequate assurance account for PSEG and confirming the amount that will remain after they remove the \$35,000 they are proposing to remove.

-----Original Message-----

From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<<mailto:zgelber@gelbersantillo.com>>>
Sent: Thursday, February 13, 2020 11:21am
To: "russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfirm.com>>"
<russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfirm.com>>>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook)

Russ,

As per our conversation the other day, please confirm once you have gotten this marked off the calendar for 2/24, and advise as to what date it is put on for. If we put it off at least a month, hopefully that will give us sufficient time to resolve. Brookfield is slow, and as discussed, I am out of town next week. Thanks.

--
Best,

Zach

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Tel: 212-227-4743
Fax:212-227-7371
Email: zgelber@gelbersantillo.com<<mailto:zgelber@gelbersantillo.com>>
Web: https://urldefense.proofpoint.com/v2/url?u=http-3A__www.gelbersantillo.com&d=DwMFaQ&c=vQdfm6aj9rMoR8LTEqbMWg&r=bAW5fw3JUroql08q_0GPxZ_X3u8fG1rw7CxUUZWA_vA&m=OyyhDeChBEs6l1pjnz-sUutBvFeg6h4aSKlv3Hcb5HM&s=XUmNqF7xGGgvYddWAI9_Qm1_CKwO8aFk99RmxLQ7a80&e=>
<https://urldefense.proofpoint.com/v2/url?u=http-3A__www.gelbersantillo.com&d=DwMFaQ&c=vQdfm6aj9rMoR8LTEqbMWg&r=vyiqXNbZE6rabCN6TCCPWiQVtAY7Kxkgtfvizr2LGLM&m=aA4YI38V-gplcmxkUsvOyAYHY14VGY2V17dcDvhWito&s=JmadiXJVC-OR0yKcR2pVvk7MjZqNYTavE0kyvdJjuULI&e=>

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Thank you.

On Mon, Feb 10, 2020 at 7:42 PM russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfirm.com>> <russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfirm.com>>> wrote:

> Where are we on this?

>

> -----Original Message-----

> From: "McLoughlin, Maeghan J."

> <MMcLoughlin@KelleyDrye.com<<mailto:MMcLoughlin@KelleyDrye.com>>>

> Sent: Tuesday, February 4, 2020 11:07am

> To: "'R. Zachary Gelber'" <zgelber@gelbersantillo.com<<mailto:zgelber@gelbersantillo.com>>>, "

> russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfirm.com>>>

> .com>"

> <russell@russelljohnsonlawfirm.com<<mailto:russell@russelljohnsonlawfir>

> m.com>>

> Cc: "LeHane Robert L."

> <RLeHane@KelleyDrye.com<mailto:RLeHane@KelleyDrye.com>>
> Subject: RE: PSE&G Claims (In re Sears Holdings Corp. et al, No.
> 18-23538
> (RDD)) - Brookfield (Willowbrook)
>
> Thanks. As I stated on our call, rather than providing information,
> letters, invoices, and checks piecemeal, it would be helpful if
> Transform could prepare one comprehensive letter laying out the
> background, the payments made, and the details underlying the amounts
> now due. I am still unclear about the significance of June 2019.
> This way, I can take this letter to the client and the appropriate
> people can review it and check their records against what you provide to them.
>
>
> MAEGHAN J. MCLOUGHLIN
> Associate Attorney
> Kelley Drye & Warren LLP
> Tel: (212) 808-7911
> mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com><mailto:m
> mcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com>>
>
> From: R. Zachary Gelber
> <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>
> Sent: Tuesday, February 4, 2020 10:15 AM
> To:
> russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm
> .com>
> Cc: McLoughlin, Maeghan J.
> <MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com>>
> Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No.
> 18-23538
> (RDD))
>
>
> CAUTION External Email
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> _____
> Thanks Russell.
>
> Maeghan, the difference between the numbers as reflected in these
> utility bills, and the numbers from the Recapture Letter (and checks
> we were paying to Brookfield along with our rent), is that these
> utility bills are for the entire space that Brookfield's predecessor
> initially leased to Sears, not just the Retained Space. Before June
> 2019, Transform/Sears was paying the entire utility for that entire
> space (the Retained Space and the
> Recaptured) directly to PSE&G. In fact, in addition to this massive
> utility bill that Sears/Transform was paying directly to PSE&G (until
> June 2019), it was also paying Brookfield the Recapture utility
> reimbursement directly. Brookfield is clearly the party responsible for these invoices.
>
> --

>

>
>
> On Tue, Feb 4, 2020 at 8:25 AM
russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:
> russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm
> .com>>
> <russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfir
> m.com>
> <mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>> wrote:
> In order to move this along, attached are the PSEG bills that started
> with a \$0 balance up to the rolling balance contained in the last 2
> invoices I provided.
>
> -----Original Message-----
> From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com><mailto:
> zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>>
> Sent: Friday, January 31, 2020 4:06pm
> To: "McLoughlin, Maeghan J." <MMcLoughlin@kelleydrye.com<mailto:MMcLoughlin@kelleydrye.com><mailto:
> MMcLoughlin@kelleydrye.com<mailto:MMcLoughlin@kelleydrye.com>>>
> Cc: "russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:
> russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm
> .com>>"
> <russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfir
> m.com>
> <mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnso
> nlawfirm.com>>>
> Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No.
> 18-23538
> (RDD))
>
> Maeghan,
>
> I can get you the details, but I doubt they were sent. LL sent Tenant
> the recapture letter, which includes amounts due to LL. Those amounts
> mirror the checks sent. Brookfield must be aware that the tenants
> were paying utilities, as that was its agreement with Sears/Transform,
> and tenants were paying those amounts monthly.
>
> --
> Best,
> Zach
>
> _____
> *Gelber & Santillo PLLC*
> 347 West 36th Street, Suite
> 805<https://urldefense.proofpoint.com/v2/url?u=https-3A__www.google.co
> m_maps_search_347-2BWest-2B36th-2BStreet-2C-2BSuite-2B805-2BNew-2BYork
> -2C-2BNY-2B10018-3Fentry-3Dgmail-26source-3Dg&d=DwMFaQ&c=vQdfm6aj9rMoR
> 8LTeqbMWg&r=vyiqXNbZE6rabCN6TCCPWtAY7Kxkgtfvizr2LGLM&m=aA4YI38V-gpl
> cmxkUsvOyAYHY14VGY2V17dcDvhWito&s=6cvKA78xFdo_R7XVgTH5ghiCFTvA712qRiVc
> 9BzXQV4&e=> New York, NY
> 10018<https://urldefense.proofpoint.com/v2/url?u=https-3A__www.google.co
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>> *MAEGHAN J. MCLOUGHLIN*
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>> Associate Attorney
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>> *Kelley Drye & Warren LLP *Tel: (212) 808-7911
>> mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com><mailto:
>> :mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com>>
>>
>>
>>
>> *From:* R. Zachary Gelber <zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com><mailto:
> zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>>>
>> *Sent:* Friday, January 31, 2020 9:06 AM
>> *To:* McLoughlin, Maeghan J. <MMcLoughlin@KelleyDrye.com<mailto:
<mailto:MMcLoughlin@KelleyDrye.com%3cmmailto:%0b>>
MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com>>>
>> *Cc:* russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com><mailto:
> russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm
> .com>>
>> *Subject:* Fwd: PSE&G Claims (In re Sears Holdings Corp. et al, No.
>> 18-23538 (RDD))
>>
>>
>>
>> *CAUTION External Email*
>>
>>
>> -----
>>
>> Russell,
>>
>>
>>
>> As requested, attached are checks for the June-September period to
>> Brookfield, which as per the Recapture Notice, including utilities.
>> If needed, we can go back further.
>>
>>
>>
>> Here is the exact breakdown of the Sept 2019 rent check sent to
> Brookfield
>>
>> Line 1 rent
>>
>> Line 2 cam
>>
>> Line 3 insurance

>>
>> Line 4 taxes
>>
>> Line 5 utility
>>
>>
>>
>>
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>>
>>
>>
>> It matches the recapture payments due.
>>
>>
>>
>> --
>>
>> Best,
>>
>> Zach
>>
>> _____
>>
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>>
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>> j9rMoR8LTeqbMWg&r=vyiqXNbZE6rabCN6TCCPWiQVtAY7Kxkgtfvizr2LGLM&m=aA4Y
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>> vA712qRiVc9BzXQV4&e=>
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>> 6aj9rMoR8LTeqbMWg&r=vyiqXNbZE6rabCN6TCCPWiQVtAY7Kxkgtfvizr2LGLM&m=aA
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>> FTvA712qRiVc9BzXQV4&e=>
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>> Fax:212-227-7371
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>> Email:
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> > Feg6h4aSKlv3Hcb5HM&s=OOERfhWo0BeGICo7qvgsO44pGWdJIVygcTZtFhKAtvA&e=
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> > t.com_s_site_XujAZpejvFW2OIhYbUKIGx-2DAi9xZIDhp72XnOC-5Fw53JmUL-5Fblf5
> > Jxgl1Byxk6Bz9-2DFKLsi0qLdgJNeNHoo9GDYZD-5FQ1XWSjCBBcwhCpAmvE6QFwVL4ALB
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> > vyiqXNbZE6rabCN6TCCPWiQvtAY7Kxkgtfvizr2LGLM&m=aA4YI38V-gplcmxkUsvOyAYH
> > Y14VGY2V17dcDvhWito&s=pftMK20HUU9FN_tdX3fetQy8vC9Oqsxh0GbWeBBsMnA&e=>
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> > xgl1Byxk6Bz9-2DFKLsi0qLdgJNeNHoo9GDYZD-5FQ1XWSjCBBcwhCpAmvE6QFwVL4ALBr
> > EEpNGSoFUQgCx5yWeMS6Ds2lp7E6gQ&d=DwMFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=b

> AW5fw3JUroql08q_0GPxZ_X3u8fG1rw7CxUUZWA_vA&m=OyyhDeChBEs6l1pjnz-sUutBv
> Feg6h4aSKlv3Hcb5HM&s=OOERfhWo0BeGICo7qvgsO44pGWdJIVygcTZtFhKAtvA&e=
> <https://urldefense.proofpoint.com/v2/url?u=https-3A__us-2Dapi.mimecas
> t.com_s_site_XujAZpejvFW2OIhYbUKIGx-2DAi9xZIDhp72XnOC-5Fw53JmUL-5FbIf5
> Jxgl1Byxk6Bz9-2DFKLsi0qLdgJNeNHoo9GDYZD-5FQ1XWSjCBBcwhCpAmvE6QFwVL4ALB
> rEEpNGSoFUQgCx5yWeMS6Dsz2lp7E6gQ&d=DwMFaQ&c=vQdfm6aj9rMoR8LTeqbMWg&r=
> vyiQXNbZE6rabCN6TCCPWiQVtAY7Kxkgtfvizr2LGML&m=aA4YI38V-gplcmxkUsvOyAYH
> Y14VGY2V17dcDvhWito&s=pftMK20HUU9FN_tdX3fetQy8vC9Oqsxh0GbWeBBsMnA&e=>

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Best,

Zach

Gelber & Santillo PLLC

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Best,
Zach

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From: "R. Zachary Gelber" <zgelber@gelbersantillo.com>

Sent: Wednesday, February 12, 2020 10:47am

To: "russell@russelljohnsonlawfirm.com" <russell@russelljohnsonlawfirm.com>

Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD)) - Brookfield (Willowbrook)

Russ,

I just left you a voicemail. Please give me a ring when you have a second to discuss.

--

Best,
Zach

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Thank you.

On Mon, Feb 10, 2020 at 7:42 PM russell@russelljohnsonlawfirm.com <russell@russelljohnsonlawfirm.com> wrote:

> Where are we on this?

>

> -----Original Message-----

> From: "McLoughlin, Maeghan J." <MMcLoughlin@KelleyDrye.com>
 > Sent: Tuesday, February 4, 2020 11:07am
 > To: "R. Zachary Gelber" <zgelber@gelbersantillo.com>, "
 > russell@russelljohnsonlawfirm.com" <russell@russelljohnsonlawfirm.com>
 > Cc: "LeHane Robert L." <RLeHane@KelleyDrye.com>
 > Subject: RE: PSE&G Claims (In re Sears Holdings Corp. et al, No.
 > 18-23538
 > (RDD)) - Brookfield (Willowbrook)
 >
 > Thanks. As I stated on our call, rather than providing information,
 > letters, invoices, and checks piecemeal, it would be helpful if
 > Transform could prepare one comprehensive letter laying out the
 > background, the payments made, and the details underlying the amounts
 > now due. I am still unclear about the significance of June 2019.
 > This way, I can take this letter to the client and the appropriate
 > people can review it and check their records against what you provide to them.

>
 >
 > MAEGHAN J. MCLOUGHLIN
 > Associate Attorney
 > Kelley Drye & Warren LLP
 > Tel: (212) 808-7911
 > mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com>

>
 > From: R. Zachary Gelber <zgelber@gelbersantillo.com>
 > Sent: Tuesday, February 4, 2020 10:15 AM
 > To: russell@russelljohnsonlawfirm.com
 > Cc: McLoughlin, Maeghan J. <MMcLoughlin@KelleyDrye.com>
 > Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No.
 > 18-23538
 > (RDD))

>
 >
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> Thanks Russell.

>
 > Maeghan, the difference between the numbers as reflected in these
 > utility bills, and the numbers from the Recapture Letter (and checks
 > we were paying to Brookfield along with our rent), is that these
 > utility bills are for the entire space that Brookfield's predecessor
 > initially leased to Sears, not just the Retained Space. Before June
 > 2019, Transform/Sears was paying the entire utility for that entire
 > space (the Retained Space and the
 > Recaptured) directly to PSE&G. In fact, in addition to this massive
 > utility bill that Sears/Transform was paying directly to PSE&G (until
 > June 2019), it was also paying Brookfield the Recapture utility
 > reimbursement directly. Brookfield is clearly the party responsible for these invoices.

>
 > --
 > Best,

> Zach

>

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> Fax:212-227-7371

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> On Tue, Feb 4, 2020 at 8:25 AM russell@russelljohnsonlawfirm.com<[mailto:](mailto:russell@russelljohnsonlawfirm.com)

> russell@russelljohnsonlawfirm.com> <russell@russelljohnsonlawfirm.com

> <<mailto:russell@russelljohnsonlawfirm.com>>> wrote:

> In order to move this along, attached are the PSEG bills that started
> with a \$0 balance up to the rolling balance contained in the last 2
> invoices I provided.

>

> -----Original Message-----

> From: "R. Zachary Gelber" <zgelber@gelbersantillo.com<[mailto:](mailto:zgelber@gelbersantillo.com)

> zgelber@gelbersantillo.com>>

> Sent: Friday, January 31, 2020 4:06pm

> To: "McLoughlin, Maeghan J." <MMcLoughlin@kelleydrye.com<[mailto:](mailto:MMcLoughlin@kelleydrye.com)

> MMcLoughlin@kelleydrye.com>>

> Cc: "russell@russelljohnsonlawfirm.com" <[mailto:](mailto:russell@russelljohnsonlawfirm.com)

> russell@russelljohnsonlawfirm.com> <russell@russelljohnsonlawfirm.com

> <<mailto:russell@russelljohnsonlawfirm.com>>>

> Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No.

> 18-23538

> (RDD))

>

> Maeghan,

>

> I can get you the details, but I doubt they were sent. LL sent Tenant
> the recapture letter, which includes amounts due to LL. Those amounts
> mirror the checks sent. Brookfield must be aware that the tenants
> were paying utilities, as that was its agreement with Sears/Transform,
> and tenants were paying those amounts monthly.

>

> --

> Best,

> Zach

>

> ***Gelber & Santillo PLLC***

> 347 West 36th Street, Suite 805

> New York, NY 10018

> Tel: 212-227-4743

> Fax:212-227-7371

> Email: zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>

> Web: www.gelbersantillo.com<http://www.gelbersantillo.com>

>

>

>

>

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> Thank you.

>

>

>

>

> On Fri, Jan 31, 2020 at 4:01 PM McLoughlin, Maeghan J. <

> MMcLoughlin@kelleydrye.com<mailto:MMcLoughlin@kelleydrye.com>> wrote:

>

>>

>>

>> Thanks. Brookfield will need the details underlying each check.

>> Were these details ever sent to Brookfield?

>>

>>

>>

>>

>>

>> ***MAEGHAN J. MCLOUGHLIN***

>>

>> Associate Attorney

>>

>>

>> ***Kelley Drye & Warren LLP *Tel: (212) 808-7911**

>> mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com>

>>

>>

>>

>> ***From:*** R. Zachary Gelber <zgelber@gelbersantillo.com<mailto:

> zgelber@gelbersantillo.com>>

>> ***Sent:*** Friday, January 31, 2020 9:06 AM

> > *To:* McLoughlin, Maeghan J. <MMcLoughlin@KelleyDrye.com<mailto:

> MMcLoughlin@KelleyDrye.com>>

> > *Cc:* russell@russelljohnsonlawfirm.com<mailto:

> russell@russelljohnsonlawfirm.com>

> > *Subject:* Fwd: PSE&G Claims (In re Sears Holdings Corp. et al, No.

> > 18-23538 (RDD))

> >

> >

> >

> > *CAUTION External Email*

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> >

> > -----

> >

> > Russell,

> >

> >

> >

> > As requested, attached are checks for the June-September period to

> > Brookfield, which as per the Recapture Notice, including utilities.

> > If needed, we can go back further.

> >

> >

> >

> > Here is the exact breakdown of the Sept 2019 rent check sent to

> Brookfield

> >

> > Line 1 rent

> >

> > Line 2 cam

> >

> > Line 3 insurance

> >

> > Line 4 taxes

> >

> > Line 5 utility

> >

> >

> >

> >

> >

> >

> >

> > It matches the recapture payments due.

> >

> >

> >

> > --

> >

> > Best,

> >

> > Zach

>>
>>
>>
>> *Gelber & Santillo PLLC*
>>
>> 347 West 36th Street, Suite 805
>>
>> New York, NY 10018
>>
>> Tel: 212-227-4743
>>
>> Fax:212-227-7371
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>> Email: zgelber@gelbersantillo.com<mailto:zgelber@gelbersantillo.com>
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>> Web: www.gelbersantillo.com<http://www.gelbersantillo.com>
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>>
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> https://us-api.mimecast.com/s/site/XujAZpejvFW2OIhYbUKIGx-Ai9xZIDhp72X
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> <
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> vE6QFwVL4ALBrEEpNGSoFUQgCxFSyWeMS6Dsz2lp7E6gQ
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-----Original Message-----
18-23538-SHL Doc.8315-3, Filed 07/20/20, Entered 07/20/20 12:00:17 Exhibit 3
From: "russell@russelljohnsonlawfirm.com" <russell@russelljohnsonlawfirm.com>
Sent: Tuesday, February 4, 2020 8:25am
To: "R. Zachary Gelber" <zgelber@gelbersantillo.com>
Cc: "McLoughlin, Maeghan J." <mmcloughlin@kelleydrye.com>, "Russell Johnson" <russell@russelljohnsonlawfirm.com>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD))

In order to move this along, attached are the PSEG bills that started with a \$0 balance up to the rolling balance contained in the last 2 invoices I provided.

-----Original Message-----
From: "R. Zachary Gelber" <zgelber@gelbersantillo.com>
Sent: Friday, January 31, 2020 4:06pm
To: "McLoughlin, Maeghan J." <MMcLoughlin@kelleydrye.com>
Cc: "russell@russelljohnsonlawfirm.com" <russell@russelljohnsonlawfirm.com>
Subject: Re: PSE&G Claims (In re Sears Holdings Corp. et al, No. 18-23538 (RDD))

Maeghan,

I can get you the details, but I doubt they were sent. LL sent Tenant the recapture letter, which includes amounts due to LL. Those amounts mirror the checks sent. Brookfield must be aware that the tenants were paying utilities, as that was its agreement with Sears/Transform, and tenants were paying those amounts monthly.

--

Best,
Zach

Gelber & Santillo PLLC
347 West 36th Street, Suite 805
New York, NY 10018
Tel: 212-227-4743
Fax: 212-227-7371
Email: zgelber@gelbersantillo.com
Web: www.gelbersantillo.com

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Thank you.

On Fri, Jan 31, 2020 at 4:01 PM McLoughlin, Maeghan J. <MMcLoughlin@kelleydrye.com> wrote:

>
>
> Thanks. Brookfield will need the details underlying each check. Were
> these details ever sent to Brookfield?

>
>
>
>
>
>
> *MAEGHAN J. MCLOUGHLIN*

>
> Associate Attorney

>
>
> *Kelley Drye & Warren LLP *Tel: (212) 808-7911
> mmcloughlin@kelleydrye.com

>
>
> *From:* R. Zachary Gelber <zgelber@gelbersantillo.com>
> *Sent:* Friday, January 31, 2020 9:06 AM
> *To:* McLoughlin, Maeghan J. <MMcLoughlin@KelleyDrye.com>
> *Cc:* russell@russelljohnsonlawfirm.com
> *Subject:* Fwd: PSE&G Claims (In re Sears Holdings Corp. et al, No.
> 18-23538 (RDD))

>
>
>
> *CAUTION External Email*

>
>
>
> -----
>
> Russell,

>
>
>
>
> As requested, attached are checks for the June-September period to
> Brookfield, which as per the Recapture Notice, including utilities.
> If needed, we can go back further.

>

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> Thank you.

>

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> <<https://us-api.mimecast.com/s/site/XujAZpejvFW2OIhYbUKIGx-Ai9xZIDhp72>
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> mvE6QFwVL4ALBrEEpNGSoFUQgCxF5yWeMS6Dsz2lp7E6gQ>

>

-----Original Message-----
From: "russell@russelljohnsonlawfirm.com" <russell@russelljohnsonlawfirm.com>
Sent: Thursday, January 23, 2020 4:36pm
To: "McLoughlin, Maeghan J." <MMcLoughlin@KelleyDrye.com>
Cc: "LeHane Robert L." <rlehane@kelleydrye.com>, "Russell Johnson" <russell@russelljohnsonlawfirm.com>
Subject: RE: Sears/Kmart - Unpaid charges owed to PSE&G for Willowbrook Mall, Wayne Twp, NJ Property

18-23538-SH Doc 8315-3 Filed 07/20/20 Entered 07/20/20 12:00:17 Exhibit 3
Pg 51 of 54

These bills have been outstanding for some time is the reason for the push.

Attached are what I received from Transform. If a conference call with Transform's counsel makes sense to work through this, please let me know.

-----Original Message-----

From: "McLoughlin, Maeghan J." <MMcLoughlin@KelleyDrye.com>
Sent: Wednesday, January 22, 2020 2:10pm
To: "russell@russelljohnsonlawfirm.com" <russell@russelljohnsonlawfirm.com>
Cc: "LeHane Robert L." <RLeHane@KelleyDrye.com>
Subject: RE: Sears/Kmart - Unpaid charges owed to PSE&G for Willowbrook Mall, Wayne Twp, NJ Property

Russell,

Brookfield is a large organization. The contact for Willowbrook is not in this week. Is there some urgency or emergency that I am not aware of? Have you obtained the documents from Transform that you referenced in your email?

We hope to reach back out next week to discuss.

MAEGHAN J. MCLOUGHLIN
Associate Attorney
Kelley Drye & Warren LLP
Tel: (212) 808-7911
mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com>

From: russell@russelljohnsonlawfirm.com <russell@russelljohnsonlawfirm.com>
Sent: Wednesday, January 22, 2020 1:59 PM
To: McLoughlin, Maeghan J. <MMcLoughlin@KelleyDrye.com>
Cc: LeHane Robert L. <RLeHane@KelleyDrye.com>

Subject: RE: Sears/Kmart - Unpaid charges owed to PSE&G for Willowbrook Mall, Wayne Twp, NJ Property

CAUTION External Email

It has been over a week from my initial request. Have you received a response from your client?

-----Original Message-----

From: "McLoughlin, Maeghan J." <MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com>>
Sent: Friday, January 17, 2020 3:21pm
To: "russell@russelljohnsonlawfirm.com"
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Cc: "LeHane Robert L." <RLeHane@KelleyDrye.com<mailto:RLeHane@KelleyDrye.com>>
Subject: RE: Sears/Kmart - Unpaid charges owed to PSE&G for Willowbrook Mall, Wayne Twp, NJ Property

Russell,

I've brought the matter to my client's attention. When I have a response, I will get back to you. I do not know exactly when that will be as Monday is a holiday.

MAEGHAN J. MCLOUGHLIN

Associate Attorney

Kelley Drye & Warren LLP

Tel: (212) 808-7911

mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com%3cmailto: mmcloughlin@kelleydrye.com>>

From: russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>
<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com>>
Sent: Friday, January 17, 2020 3:20 PM
To: McLoughlin, Maeghan J. <MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com>>
Cc: LeHane Robert L. <RLeHane@KelleyDrye.com<mailto:RLeHane@KelleyDrye.com>>
Subject: RE: Sears/Kmart - Unpaid charges owed to PSE&G for Willowbrook Mall, Wayne Twp, NJ Property

CAUTION External Email

Thank you.

When do you expect to have a response?

-----Original Message-----

From: "McLoughlin, Maeghan J."
<MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com%3cmail to:MMcLoughlin@KelleyDrye.com>>>
Sent: Wednesday, January 15, 2020 11:49am

To: "russell@russelljohnsonlawfirm.com"

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>, "LeHane Robert L."
<RLeHane@KelleyDrye.com<mailto:RLeHane@KelleyDrye.com<mailto:RLeHane@KelleyDrye.com%3cmmailto:RLeHane@KelleyDrye.com>>>

Subject: RE: Sears/Kmart - Unpaid charges owed to PSE&G for Willowbrook Mall, Wayne Twp, NJ Property

Thanks, Russell. I will discuss with Brookfield and get back to you.

MAEGHAN J. MCLOUGHLIN

Associate Attorney

Kelley Drye & Warren LLP

Tel: (212) 808-7911

mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com<mailto:mmcloughlin@kelleydrye.com%3cmmailto:mmcloughlin@kelleydrye.com>>

From:

russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Sent: Tuesday, January 14, 2020 5:57 PM

To: McLoughlin, Maeghan J.

<MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com<mailto:MMcLoughlin@KelleyDrye.com%3cmmailto:MMcLoughlin@KelleyDrye.com>>>; LeHane Robert L.

<RLeHane@KelleyDrye.com<mailto:RLeHane@KelleyDrye.com<mailto:RLeHane@KelleyDrye.com%3cmmailto:RLeHane@KelleyDrye.com>>>

Cc: Russell Johnson

<russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>>

Subject: Sears/Kmart - Unpaid charges owed to PSE&G for Willowbrook Mall, Wayne Twp, NJ Property

CAUTION External Email

Conflict counsel for Transform, Zachary Gelber, Esq. contacted me today about the attached unpaid invoice (also attached is the invoice for the prior service period) from Public Service Electric and Gas Company.

According to Transform, they paid your client the funds to pay these invoices, but the invoices were not paid. I do not have the documents from Transform yet, but am contacting you to determine who is going to pay this final unpaid invoice.

Thank you for your assistance.

Russell R. Johnson III

Law Firm of Russell R. Johnson III, PLC

2258 Wheatlands Drive

Manakin-Sabot, VA 23103

Phone: 804-749-8861

Fax: 804-749-8862

Email:
russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com<mailto:russell@russelljohnsonlawfirm.com%3cmmailto:russell@russelljohnsonlawfirm.com>>

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[FKLsi0qLdgJNeNHoo9GDYZD_Q1XWSjCBBcwhCpAmvE6QFwVL4ALBrEEpNGSoFUQgCxF5yWeMS6Dsz2lp7E6gQ](https://us-api.mimecast.com/s/site/XujAZpejvFW2OIhYbUKIGx-Ai9xZIDhp72XnOC_w53JmUL_blf5Jxgl1Byxk6Bz9-FKLsi0qLdgJNeNHoo9GDYZD_Q1XWSjCBBcwhCpAmvE6QFwVL4ALBrEEpNGSoFUQgCxF5yWeMS6Dsz2lp7E6gQ)>>